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**From:** Savoia, Pete [Savoia.Pete@epa.gov]  
**Sent:** 4/7/2022 1:17:39 AM  
**To:** Bloem, Thomas [Bloem.Thomas@epa.gov]  
**CC:** Britton, Wade [Britton.Wade@epa.gov]; Hawkins, Monica [Hawkins.Monica@epa.gov]; Yang, Yung [Yang.Yung@epa.gov]  
**Subject:** RE: broflanilide corn seed treatment - screen

I think our slide for Broflanilide should convey these findings for the briefing Nice work Tom digging this up.

Pete

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**From:** Bloem, Thomas <Bloem.Thomas@epa.gov>  
**Sent:** Wednesday, April 6, 2022 6:15 PM  
**To:** Savoia, Pete <Savoia.Pete@epa.gov>  
**Subject:** RE: broflanilide corn seed treatment - screen

The confined study encompasses PBIs of 30, 120, and 270 days; also have field rotational data. Based on these data, the ROC in rotational crops is only parent and the following PBIs were recommended provided the application rate is  $\leq 0.045$  lb ai/acre: 30days for all crops except leafy vegetables where a 60-day PBI is appropriate.

## Ex. 5 Deliberative Process (DP)

group).

The crop (primary and rotational) and livestock metabolism studies did not demonstrate the separation of the PFAS moiety from the rest of the compound.

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**From:** Savoia, Pete <Savoia.Pete@epa.gov>  
**Sent:** Wednesday, April 6, 2022 1:54 PM  
**To:** Bloem, Thomas <Bloem.Thomas@epa.gov>  
**Subject:** RE: broflanilide corn seed treatment - screen

Let's talk about this. Do we have a confined rotational crop study available and to what interval was it carried out to?

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**From:** Bloem, Thomas <Bloem.Thomas@epa.gov>  
**Sent:** Wednesday, April 6, 2022 8:42 AM  
**To:** Savoia, Pete <Savoia.Pete@epa.gov>  
**Cc:** Britton, Wade <Britton.Wade@epa.gov>; Yang, Yung <Yang.Yung@epa.gov>; Hawkins, Monica <Hawkins.Monica@epa.gov>  
**Subject:** RE: broflanilide corn seed treatment - screen

The PFAS moiety is bound to the brominated phenyl ring with all identified metabolites that contain the brominated ring also containing the PFAS moiety (primary crop, rotated crop, livestock). However, as EFED said in yesterday's meeting, PFAS may be separated at intervals greater than those employed in the studies.

Concerning the screen, should I mention the PFAS issue; (1) or (2).

- (1) HED has conducted a 90-day screen of the proposed broflanilide corn (field, pop, sweet) seed treatment use. HED concludes that sufficient information is available to move forward with the review.
- (2) HED has conducted a 90-day screen of the proposed broflanilide corn (field, pop, sweet) seed treatment use. HED concludes that sufficient information is available to move forward with the review. It is noted that the PFAS issue is yet to be resolved.

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**From:** Savoia, Pete <[Savoia.Pete@epa.gov](mailto:Savoia.Pete@epa.gov)>

**Sent:** Wednesday, April 6, 2022 7:24 AM

**To:** Bloem, Thomas <[Bloem.Thomas@epa.gov](mailto:Bloem.Thomas@epa.gov)>

**Cc:** Britton, Wade <[Britton.Wade@epa.gov](mailto:Britton.Wade@epa.gov)>; Yang, Yung <[Yang.Yung@epa.gov](mailto:Yang.Yung@epa.gov)>; Hawkins, Monica <[Hawkins.Monica@epa.gov](mailto:Hawkins.Monica@epa.gov)>

**Subject:** RE: broflanilide corn seed treatment - screen

Hi Tom,

Thanks for getting back to me on the PFAS/Broflanilide issue. Seems the characterization in soil would be something that EFED would have to weigh in on based on their available fate data, correct? As for the uptake of the moiety in crops through soil, the only possible way we would possibly see this would be through the confined rotational crop study and I am guessing that this was not the case, correct? If so, then I think we should phrase things in this manner in our slide for the briefing.

Pete

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**From:** Bloem, Thomas <[Bloem.Thomas@epa.gov](mailto:Bloem.Thomas@epa.gov)>

**Sent:** Wednesday, April 6, 2022 7:08 AM

**To:** Hawkins, Monica <[Hawkins.Monica@epa.gov](mailto:Hawkins.Monica@epa.gov)>; Yang, Yung <[Yang.Yung@epa.gov](mailto:Yang.Yung@epa.gov)>; Savoia, Pete <[Savoia.Pete@epa.gov](mailto:Savoia.Pete@epa.gov)>

**Subject:** broflanilide corn seed treatment - screen

Hello – I was going to send the screen to RD (see below) and was wondering if we need to add anything concerning the PFAS issue. I see two issues: (1) although the crop (primary and rotational) and livestock metabolism studies did not demonstrate the separation of the PFAS moiety from the rest of the compound, it is possible that in soil over-time this occurs with the free PFAS moiety then taken up by crops or being washed into drinking water and (2) need to make a determination on the mechanism of toxicity of broflanilide with the other PFAS pesticides and PFASs in general (is a cumulative assessment required).

Tom

HED has conducted a 90-day screen of the proposed broflanilide corn (field, pop, sweet) seed treatment use. HED concludes that sufficient information is available to move forward with the review.